

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Lifeline and Link Up Reform and Modernization)	WC Docket No.11-42
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Federal State Joint Board on Universal Service)	CC Docket No. 96-45
)	

To: The Commission

COMMENTS OF COX COMMUNICATIONS, INC.

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EXECUTIVE SUMMARY

As a provider of broadband and Lifeline and Link Up services, Cox supports the Commission's further inquiry regarding reform and modernization of the Lifeline and Link Up programs, and welcomes the opportunity to provide additional input.

The Commission can and should establish pilot programs to support low-income consumers' access to and adoption of broadband. The use of universal service funds for pilot program equipment and training is within the Commission's authority, and a pilot program would be an important first step in the extension of low-income support to broadband services. In structuring the pilot programs, valuable lessons can be learned from the NTIA DTV converter coupon program. Cox also proposes that the broadband pilot programs (1) should use existing Lifeline eligibility requirements, with which stakeholders are already familiar; (2) should not erect barriers to consumer participation; (3) should target specific geographic regions throughout the country; and (4) should use vouchers to support consumers' purchase of broadband and necessary equipment.

The Commission should consider whether the Link Up program continues to be useful and necessary to low-income consumers. In any case, any modifications to the Link Up rules should not create barriers to customers' ability to switch providers.

The eligibility verification concerns identified by the Commission will best be addressed by the expeditious implementation of the proposed national customer eligibility database, rather than a focus on interim solutions. Finally, any one-per-household rule should be based on similar rules for existing programs and be simple to administer.

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Cox Communications, Inc. (“Cox”) hereby responds to the August 5, 2011 Public Notice (“*Notice*”) issued in the above-captioned dockets.¹ As a commenter in response to the Commission’s notice of proposed rulemaking (“*NPRM*”) in these same dockets,² Cox appreciates that there are numerous complex pieces involved in the important effort of reforming and modernizing Lifeline and Link Up. Cox therefore applauds the Commission for further inquiring into several of these areas by issuing the *Notice*, and welcomes the opportunity to provide further input into the Commission’s reform and modernization process.

As explained in the Cox NPRM Comments, Cox’s substantial experience as an eligible telecommunications carrier (“ETC”) and the company’s ongoing commitment to increasing broadband adoption within its markets serve to inform Cox’s approach to the issues raised in the Lifeline and Link Up proceedings. Providing advanced digital video, Internet, telephone and wireless services, Cox is the third-largest U.S. cable TV company, serving more than 6 million

¹ *Further Inquiry Into Four Issues in the Universal Service Lifeline/Link Up Reform and Modernization Proceeding*, Public Notice, DA 11-1346 (rel. Aug. 5, 2011) (“*Notice*”).

² *Lifeline and Link Up Reform and Modernization; Federal-State Joint Board on Universal Service; Lifeline and Link Up*, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45, Notice of Proposed Rulemaking, 26 FCC Rcd 2770 (2011) (“*NPRM*”); Comments of Cox Communications, Inc. (filed Apr. 21, 2010) (“Cox NPRM Comments”).

residences and businesses. Cox serves more than 2.6 million telephone customers, offering local and long distance voice service to residential and commercial customers. Cox consistently has been a competitive pioneer: in becoming one of the first facilities-based competitors in the local telephone business; in offering broadband Internet access over its cable facilities; and, most recently, in launching wireless services. Cox has repeatedly won awards for the quality of its service, including multiple J.D. Power and Company awards for telephone and Internet service.³

Cox's long experience as a telephone competitor includes ETC certification in several states and providing Lifeline service to low-income customers.⁴ As Cox previously has explained, Lifeline programs allow Cox to offer a competitive voice service option for lower income Americans in many locations, helping to ensure that "consumers in all regions of the nation, including low-income customers ... have access to telecommunications and information services" at "affordable rates,"⁵ rates that are often below the prevailing Lifeline rates of the incumbent providers. In addition, because Cox is closely involved with the communities it serves, it can tailor its participation in these programs to local needs.⁶ Cox also has devoted significant resources to increasing broadband adoption in its markets.⁷ Through these efforts,

³ See Cox Communications, Inc., "Awards and Honors," <http://cox.mediaroom.com/index.php?s=59>.

⁴ Cox currently participates in the federal Low Income USF programs in Connecticut, Georgia, Iowa, Kansas, Louisiana, Nebraska, Oklahoma, and Rhode Island. Cox also is considering or actively pursuing ETC status for the Low Income programs in several other states. Finally, Cox participates in the California State Low-Income program.

⁵ 47 U.S.C. § 254(b)(1), (3).

⁶ See Cox NPRM Comments at 2.

⁷ See, e.g., Letter from Grace Koh, Policy Counsel, Cox Enterprises, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket No. 03-109 (Jul. 22, 2010), attaching a press release announcing Cox's partnership with Louisiana's Lafayette Parish School System; see also Letter from William J. Cirone, Superintendent, Santa Barbara County Education Office, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket No. 09-51 (Jun. 24, 2009), discussing Cox's partnership with the Santa Barbara County public school system in the Computers for Families program. See also Cox Comments, *The National Broadband*

Cox has learned—as the Commission also has recognized—that one of the primary barriers to adoption is the lack of necessary computer equipment and training.

Based on Cox’s experience with Lifeline programs and its efforts to increase broadband adoption, Cox is in firm agreement with the Commission that reform and modernization of Lifeline is both necessary and achievable. As explained in the Cox NPRM Comments, the Commission’s reforms should, among other things, bolster protections against waste, fraud, and abuse; control the size of the program; strengthen administration and accountability; and improve enrollment and outreach efforts.⁸ Cox set forth in its NPRM Comments a vision that these goals are best achieved by adoption of a centralized national eligibility database and by reform measures that include the implementation of geographically diverse pilot programs to extend low-income universal service support to broadband services. The *Notice* seeks further comment on four issues that directly relate to the vision laid out in the Cox NPRM Comments, and Cox is pleased to have the opportunity to provide further input to the Commission in these areas.

Cox looks forward to continuing to assist the Commission in achieving meaningful reform that works for consumers and carriers.

I. THE COMMISSION CAN AND SHOULD ESTABLISH A PILOT PROGRAM TO SUPPORT LOW-INCOME CONSUMERS’ ACCESS TO BROADBAND

The primary issue on which the *Notice* seeks comment is the design and implementation of Lifeline/Link Up broadband pilot programs to evaluate whether and how these programs can

Plan; The Role of the Universal Service Fund and Intercarrier Compensation in the National Broadband Plan, GN Dockets Nos. 09-47, 09-51, 09-137 (filed Dec. 7, 2009) (“Cox NBP USF Comments”).

⁸ Cox NPRM Comments at 2.

effectively support broadband adoption by low-income households.⁹ As discussed in detail in the Cox NPRM Comments, Cox supports extending low-income universal support to broadband services, beginning with targeted pilot programs that can be used to assess the best approach to a long-term program.¹⁰ In Cox's experience, one of the most significant barriers to broadband adoption is the lack of necessary equipment: Cox's internal research shows that approximately 70 percent of low-income customers in its markets do not have computers. Voucher programs, described in detail below, which could leverage the existing Lifeline infrastructure to provide support for both services and equipment would address this barrier. The Commission has authority to create and fund such a program using universal service support, and it should do so expeditiously to begin bringing the benefits of broadband to those for whom the lack of equipment has served as a barrier to adoption.

A. The FCC Has the Authority to Provide Universal Service Support for Equipment and Training

As Cox has argued previously, the Commission's Lifeline broadband pilot programs should include support for consumer Internet access devices (such as computers) and digital literacy training.¹¹ The *Notice* observes that several commenters advocate such support, and

⁹ *Notice* at 2-3. As discussed herein, while Cox believes the Commission should examine whether the Link Up program continues to be an effective use of government resources to defray the cost of activating for telephony service, the Commission should experiment with how one-time discounts to reduce the cost of activating broadband might affect broadband adoption rates. Accordingly, Cox fully supports the establishment of a broadband pilot program that features discounts that work like the Lifeline and the Link-Up Program, with the caveat that the latter discount should not pose a barrier to consumers exercising their right to choose among participating broadband providers, as the Link Up discount for telephony does today. Using the Lifeline and Link Up programs are particularly likely to be successful because these programs are already proven, effective distribution mechanisms for low-income support. The Lifeline and Link Up programs also are ideally positioned to address the most significant barriers to broadband adoption. *See* Cox NPRM Comments at 10-11.

¹⁰ Cox NPRM Comments at 10.

¹¹ Cox comments at 11.

seeks further comment on the Commission’s authority to provide it.¹² Cox believes that the Commission has ample authority to provide support for equipment and training, and that such support is entirely consistent with the Commission’s statutory universal service and broadband mandates.

First, the record in the universal service dockets amply demonstrates that the Commission has the authority to use universal service support to defray broadband service charges.¹³ Briefly stated, the Communications Act of 1934, as amended (the “Act”), requires the universal service program to provide “access to advanced telecommunications and information services,”¹⁴ and to ensure that “low-income consumers” have access to “advanced telecommunications and information services.”¹⁵ Although section 254(c) suggests that universal service is initially defined in terms of “telecommunications services,” it also requires that the definition of universal service must “evolv[e],” “taking into account advances in telecommunications and information technologies and services.”¹⁶ Moreover, the Commission’s power to modify the definition of universal service is framed broadly in terms of “services,” and is not limited to “telecommunications services.” The Commission’s authority in this regard is also amplified by

¹² Notice at 2, § 1.a.

¹³ See, e.g., Letter from Robert Quinn, AT&T; Steve Davis, Century Link; Michael Skrivan, Fairpoint; Kathleen Abernathy, Frontier; Kathleen Grillo, Verizon; Michael Rhoda, Windstream; to Marlene Dortch, FCC, WC Docket Nos. 10-90 *et al.* (filed July 29, 2011) (“ABC Plan”), Att. 5 at 44-49 (Legal Authority White Paper).

¹⁴ 47 U.S.C. § 254(b)(2).

¹⁵ 47 U.S.C. § 254(b)(3).

¹⁶ 47 U.S.C. § 254(c)(1).

section 706 of the Telecommunications Act of 1996 (“1996 Act”)¹⁷ and the broadband provisions of the American Recovery and Reinvestment Act of 2009.¹⁸

Second, the record includes overwhelming evidence that lack of access to equipment and training are key barriers to low-income consumers’ access to broadband. The Commission’s own study found that fully 40 percent of Internet non-users cite the cost of a computer as a reason for their not using the Internet, and this was cited second-most often as the “main reason” that non-users did not use the Internet.¹⁹ Similarly, 46 percent of non-users stated that their discomfort with using a computer was a reason they do not use the Internet, and this discomfort was cited most often by non-users as the “main reason” they do not use the Internet.²⁰

Given this record, the Commission may exercise its ancillary authority to provide universal service support for computer equipment and training to assist low-income consumers to access the Internet. The U.S. Court of Appeals for the D.C. Circuit has held that the Commission may validly exercise its ancillary authority “only when two conditions are satisfied: (1) the Commission’s general jurisdictional grant under Title I [of the Communications Act] covers the regulated subject and (2) the regulations are reasonably ancillary to the Commission’s effective performance of its statutorily mandated responsibilities.”²¹ Here, ensuring Internet access to low-income consumers is clearly covered by the Commission’s broad grant of Title I authority over “interstate and foreign commerce in communications by wire and radio so as to make

¹⁷ 47 U.S.C. § 1302(a)-(b).

¹⁸ American Recovery and Reinvestment Act of 2009, Pub. L. 111-5, § 1305(k) (“Recovery Act”).

¹⁹ John B. Horrigan, BROADBAND ADOPTION AND USE IN AMERICA, OBI Working Paper Series No. 1 (available at hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-296442A1.pdf) (“Horrigan”) at 27.

²⁰ *Id.*

²¹ *Comcast v. FCC*, 600 F.3d 642 (D.C. Cir 2010), quoting *American Library Ass’n v. FCC*, 406 F.3d 689, 691-92 (D.C. Cir 2005).

available, so far as possible, to all the people of the United States ... a rapid, efficient, Nation-wide, and world-wide wire and radio communication service ... at reasonable charges.”²²

Further, in light of the evidence, using universal service funding to support computer equipment and training for low-income consumers is reasonably ancillary to the effective performance of the Commission’s statutorily mandated responsibilities to provide “access to advanced telecommunications and information services,”²³ and to ensure that “low-income consumers” have access to “advanced telecommunications and information services.”²⁴

B. The NTIA DTV Converter Coupon Program Provides Useful Lessons for Lifeline Broadband Pilot Programs

The recent experience of the Department of Commerce’s National Telecommunications and Information Administration (“NTIA”) in administering government coupons for the acquisition of digital-to-analog converter boxes can provide useful lessons for designing Lifeline broadband pilot programs.²⁵ The NTIA program was designed to help consumers continue to receive free, over-the-air broadcast television signals once full-power television stations ceased analog broadcasting as required by statute. Specifically, the coupon program was directed at households with analog televisions, equipment that would be insufficient to receive digital broadcasts after the digital television transition. All U.S. households were eligible to request up to two \$40 coupons to be used toward the purchase of up to two digital-to-analog converter

²² 47 U.S.C. § 151. *See also Comcast, supra*, 600 F.3d at 651 (assuming without discussion that Internet access falls within the Commission’s Title I authority).

²³ 47 U.S.C. § 254(b)(2).

²⁴ 47 U.S.C. § 254(b)(3).

²⁵ *See, e.g.*, <http://www.ntia.doc.gov/legacy/dtvcoupon/rules.html>.

boxes.²⁶ To minimize waste, fraud, and abuse, the coupons were electronically trackable and uniquely numbered so that each transaction could be verified at the retailer's point of sale terminal through NTIA's coupon distribution database. Manufacturers were required to build devices to certain specifications and were required to follow a technical approval process that included submission of production models and certified testing results for review and possible testing by the FCC. Retailers were encouraged to participate in the program and were required to apply to be included in NTIA's database. They also were required to train employees on the purpose and operation of the coupon program with materials provided by NTIA.

As discussed in more detail below, a Lifeline broadband pilot program similarly could provide vouchers, i.e. discounts, to defray service-initiation and monthly recurring fees for broadband service, as well as to purchase computer equipment.

C. Elements of a Lifeline Broadband Pilot Program

Cox consistently has advocated that a sustainable Lifeline broadband program should be guided by four principles.²⁷ First and foremost, the program should *focus on the customer*, by providing flexibility to obtain the necessary equipment and service. Second, the program should *not encourage low-income broadband subscribers to take a lower-speed service*. Third, the program should focus on *eliminating the affordability barrier*. Finally, the program should be *large enough to have a real and appreciable effect* on broadband adoption. Each of these four principles—or a variant thereof—was a component of the successful NTIA program.

In addition, the Lifeline broadband pilot program should include the following elements:

²⁶ The program originally did not require a household to be solely over-the-air and did not include an income threshold.

²⁷ Cox NPRM Comments at 10; Cox NBP USF Comments at 12-15.

Existing eligibility requirements for the low-income program should be extended to the broadband pilot program.²⁸ Carriers who participate in the current Lifeline program are familiar with the mechanics of how the discount works and how a provider is reimbursed; maintaining this process will ease administration of the program for carriers participating in both existing program and the pilot. In addition, extension of existing eligibility requirements will mitigate the potential for low-income customer confusion. Finally, use of existing criteria will help the pilot program yield better data on how to accomplish the Commission's goals.²⁹

The pilot program should not erect barriers to consumer participation.³⁰ Consistent with the resolution adopted by the National Association of Regulatory Utility Commissioners ("NARUC"), pilot program participants should not be required to change providers or purchase particular services packages when they purchase Lifeline and Link Up services and devices.³¹ Any such requirement would create an additional obstacle to, rather than facilitate, broadband adoption. Consumer education regarding broadband adoption is key.

Therefore, the Commission should improve digital literacy either by directly funding consumer education programs that would work in conjunction with and be a complement to the proposed Lifeline broadband pilot programs, or encouraging participating providers to partner

²⁸ See Notice at 2 ("We seek additional focused comment specifically on whether to maintain the current eligibility requirements for consumers participating in the pilot program that are currently used in the low-income program, or whether to adopt stricter or more permissive eligibility requirements for those consumers.").

²⁹ *Id.*

³⁰ See Notice at 2-3 (requesting commenters to address recommendations not to require pilot program participants to change local telephone service providers, purchase bundled broadband and voice services, or otherwise be penalized when they purchase Lifeline and Link Up services and enabling access devices).

³¹ Resolution Supporting a Low-Income Broadband Service Adoption Program (adopted by NARUC Board of Directors July 20, 2011) ("NARUC Resolution") at 2 ("Resolved, that the FCC should require that Lifeline/Link Up Broadband Service Pilot Program participants are not required to change local telephone service providers, purchase bundled broadband and voice services or otherwise are penalized in order to obtain Lifeline and Link Up broadband services and enabling devices.").

with community-based organizations, schools, and community colleges. Participating pilot program service providers could provide customers with information on accessing the digital literacy programs as part of outreach efforts, but consumer knowledge of such programs would best be advanced through existing community and state low income programs.

The pilot program should target limited, geographically defined locations throughout the country. Consistent with NARUC's recommendation, implementation of a pilot program in each NARUC region would advance geographic diversity.³² The Commission could identify particular census tracts throughout the United States, including some in Tribal Lands.

Vouchers can be used to facilitate low-income consumers' purchase of broadband services and necessary equipment. The pilot program should utilize monthly service "virtual" vouchers (*i.e.*, discounts that flow to qualifying consumers' bills, much as the telephony Lifeline discounts work today) and one time "virtual" vouchers (*i.e.*, discounts that flow to consumers' bills, much as the telephony Link Up discounts work today) for fixed dollar amounts. In order to sufficiently defray the cost of lower-speed broadband service and help customers who want to stretch their resources to subscribe to higher speeds,³³ the pilot program should provide a 50 percent discount on an activation fee (discount not to exceed \$30.00), where applicable,³⁴ and a

³² NARUC Resolution at 2 ("Resolved, that the FCC, on behalf of the Native Nations, and the States jointly establish at least one [pilot program] project in each of the five NARUC affiliated regulatory conference regions").

³³ The program should not dictate the speed tier that eligible customers may choose. A fixed dollar amount subsidy for service vouchers will enable a low-income consumer who only needs lower-speed service to defray a greater portion of the cost. However, some low-income consumers seeking to adopt broadband may require a higher-speed service, and a fixed amount voucher will provide some assistance for such consumers.

³⁴ If the provider offers free activation of service to a regular customer, then the provider would not reflect a discount or be reimbursed for it under the pilot program. While Cox encourages the Commission below to consider whether the Link Up program continues to be a necessary and meaningful allocation of resources for telephony services, the Commission is now only starting to learn how discounts for service activation may provide an incentive for broadband adoption. Therefore, Cox believes that a broadband pilot program should include a discounted activation rate, where applicable, as long as the discount does not act as a barrier to consumers exercising

\$15.00 monthly discount on broadband service. Based on Cox’s experience, these discounts should offer meaningful financial help to customers who want to subscribe to broadband but have not been able to afford it.

For equipment, the pilot program should offer a one-time paper voucher worth \$200.00 that can be used to purchase a PC or laptop from any retailer or manufacturer, including a retailer or manufacturer that has entered into an arrangement with one or more service providers.

While some aspects of the pilot Lifeline broadband voucher program would differ from the structure of the NTIA DTV converter coupon process, the Commission and NTIA have gained useful experience from the DTV program that is applicable here. For example, even though equipment vouchers would be paper, they could be electronically generated and uniquely trackable, thereby aiding administration of the program and facilitating evaluation. In addition, although the broadband program would be open to any retailer, the government could provide training information that would allow retailer employees to communicate more effectively with low-income customers seeking to utilize a voucher to purchase enabling equipment for broadband.

The Commission can evaluate the success of the pilot program by requiring providers to submit reports. In conjunction with the Universal Service Administrative Company’s (“USAC”) recordkeeping requirements for low income support found in 47 C.F.R. section 54.417, providers participating in the pilot programs could submit to the FCC a report at the conclusion of the programs detailing the number of existing Lifeline customers who transferred to the broadband pilot program as well as the number of new customers who participated. As it has done on other

competitive choice, as the current Link Up program does. Then, when evaluating the efficacy of the programs, the Commission can determine whether to retain Link Up discounts for broadband.

topics, the FCC should also hold a workshop at that time to discuss which elements of the pilot program worked and which elements did not.

II. IF LINK UP IS RETAINED, THE RULES SHOULD NOT ERECT BARRIERS TO SWITCHING

The *Notice* seeks comment on several issues regarding Link Up reimbursement, including on whether Link Up should be retained.³⁵ Cox encourages the Commission to consider as a preliminary matter whether Link Up reimbursement for telephony services continues to be a necessary or valuable use of government resources. As the Commission notes, many providers today do not impose service initiation charges for those services. Even providers that theoretically impose service initiation charges often waive them in order to facilitate customer acquisition. To the extent that Link Up support is not necessary to defray a real cost, the support would better serve consumers by being reallocated to a more productive use.

If the Commission determines that Link Up reimbursement should be retained, it is essential that its continued operation not serve as a barrier to customers' ability to switch providers. Current limitations on providing Link Up support at the same address create a competitive disadvantage for competing providers. Cox recognizes the need for economy in the program, but such a need cannot justify an anti-competitive policy that inhibits customer choice.

III. ELIGIBILITY VERIFICATION CONCERNS ARE BEST ADDRESSED BY EXPEDITIOUS IMPLEMENTATION OF THE NATIONAL CUSTOMER ELIGIBILITY DATABASE

As discussed in detail in Cox's NPRM Comments, Cox believes that a national customer eligibility database will solve many of the issues raised in this proceeding.³⁶ The Commission

³⁵ *Notice* at 6-7.

³⁶ *See* Cox NPRM Comments at 3-6.

has recognized that a national database “could substantially reduce burdens” on consumers, ETCs, states, and the USAC, and this is consistent with Cox’s projections regarding resource and cost savings.³⁷ Indeed, a national database would alleviate any need to establish a uniform methodology, applicable to all states, for conducting verification sampling and would make it unnecessary to modify the existing sampling methodology.³⁸ With a national database, a provider will be able to check in real time to determine whether a customer is eligible, thereby eliminating any need for today’s cumbersome verification process and subsequent sampling confirmation. Such a database also would address duplicate claims, eligibility standards, audits, and facilitate de-enrollment and coordinated enrollment.

While Cox appreciates the Commission’s well-intended proposals to address eligibility issues in the short term, the proposals in the *Notice* would cause more harm than good. Rather than wasting Commission and provider resources on one or more interim solutions, the Commission should simply focus its attention on creating and deploying the national database.³⁹ This can be done without imposing any new data collection burdens that would be burdensome to providers and/or present issues under various privacy statutes and regulations.

IV. ANY ONE-PER-HOUSEHOLD RULE SHOULD BE BASED ON OTHER PROGRAMS AND SIMPLE TO ADMINISTER

To the extent that the Commission determines that it should adopt a one-per-household rule in the Lifeline program, Cox concurs with other commenters recommending that the Commission adopt a definition of “household” that mirrors the definition used to establish

³⁷ See Cox NPRM Comments at 3, n.7 citing Letter from Sharon Gillett, Wireline Competition Bureau Chief, Federal Communications Commission, to Richard Belden, USAC (Jan. 12, 2011).

³⁸ See *Notice* at 7.

³⁹ During this period, the Commission should preserve the ability of consumers to self-certify eligibility, rather than placing unnecessary new administrative burdens on ETCs. See Cox NPRM Comments at 4.

eligibility for other federal programs.⁴⁰ Using a definition that is already in use by social service organizations for a similar benefit program will maximize the extent to which existing procedures and mechanisms can be used to establish consumers' eligibility for program benefits. This also should facilitate the deployment of a national eligibility database.

The definition used in the Low Income Home Energy Assistance Program ("LIHEAP") appears to provide a worthwhile model for the Lifeline program.⁴¹ The LIHEAP definition defines a household as "[a]ny individual or group of individuals who are living together as one economic unit."⁴² This definition appears to focus on the relevant *economic* arrangement of the individuals who may be living at the same location, and is therefore superior to the Census Bureau's definition, which appears to focus solely on the individuals' living quarters.⁴³

If the Commission adopts a one-per-household rule, Cox also agrees that the Commission should adopt additional rules to address group living situations.⁴⁴ In this regard, Cox recommends that the Commission consider the "Roommate Rule" used by the California Public Utilities Commission ("CPUC") for the California Lifeline program. Under that rule, California "allows for multiple Lifeline accounts at the same physical address if ... participants meet the ... program eligibility requirements and maintain separate households."⁴⁵ As California has made

⁴⁰ Notice at 4.

⁴¹ *Id.*

⁴² *Id.* at n.24.

⁴³ *Id.* at n.25.

⁴⁴ *Id.* at 5.

⁴⁵ Resolution T-1732, Calif. Pub. Utils. Comm'n (July 28, 2011), at 5 (available at http://docs.cpuc.ca.gov/WORD_PDF/FINAL_RESOLUTION/140386.PDF).

clear, the Roommate Rule allows consumers to qualify individually for Lifeline even if they live at the same address as long as they are living as separate “economic units.”⁴⁶

V. CONCLUSION

Cox urges the Commission to adopt reforms to the Lifeline and Link Up programs consistent with these comments. Cox welcomes the opportunity to support the Commission in its revisions to the Lifeline rules, and looks forward to continuing to participate in this valuable program.

Respectfully submitted,

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⁴⁶ *Id.*